

## **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

**PHC INDUSTRIAL, LLC,**

**Plaintiff,**

**v.**

**RICHARD P. MONAHAN and  
KRISTIN MONAHAN and  
COAST TO COAST CONSULTING AND  
CONTRACTING, LLC**

**Civil Action No. 4:19-cv-00019**

**CONSENT JUDGMENT**

**Defendants.**

THIS CAUSE is before the undersigned United States District Court Judge for the Eastern District of Virginia upon the consent of the Parties. Plaintiff PHC Industrial, LLC ("PHCI"), Defendants Richard P. Monahan and Kristin Monahan (collectively the "Monahan Defendants"), and Defendant Coast to Coast Consulting and Contracting, LLC ("Coast to Coast") for entry of a consent judgment. Upon consideration of the pleadings, and with the consent of PHCI, the Monahan Defendants, and Coast to Coast as evidenced by the signatures hereto, it appears to the Court that judgment should be entered as set forth herein.

IT IS THEREFORE ORDERED that JUDGMENT BY CONSENT is entered in favor of Plaintiff PHC Industrial, LLC and is entitled to the following findings of fact and conclusions of law as follows:

1. The Monahan Defendants and Coast to Coast do not contest that they misappropriated trade secrets belonging to Plaintiff PHCI.

2. Judgment by consent is therefore entered in favor of Plaintiff PHCI and against each of the Monahan Defendants and Coast to Coast on Plaintiff's Count One of the Complaint for violation of the Federal Defendant Trade Secrets Act, 18 U.S.C. § 1836 et seq.
3. Judgment by consent is, for the same reasons, also therefore entered in favor of Plaintiff PHCI and against each the Monahan Defendants and Coast to Coast on Plaintiff's Count Two of the Complaint for violation of the Virginia Uniform Trade Secrets Act, Va. Code § 59.1-336 et seq.
4. The Monahan Defendants do not contest they converted Property belonging to Plaintiff PHCI. Judgment by consent is therefore entered in favor of Plaintiff PHCI and against each of the Monahan Defendants on Plaintiff's Count Three for Conversion.
5. The Monahan Defendants do not contest that they committed fraud against Plaintiff PHCI. Judgment by consent is therefore entered in favor of Plaintiff PHCI and against each of the Monahan Defendants on Plaintiff's Count Four for Fraud.
6. The Monahan Defendants do not contest that they breached their fiduciary duty of loyalty to Plaintiff PHCI interfered with one or contracts to which Plaintiff PHCI was a party. Judgment by consent is therefore entered in favor of Plaintiff PHCI and against each of the Monahan Defendants on Plaintiff's Count Five for Breach of Fiduciary Duty of Loyalty.
7. The Monahan Defendants and Coast to Coast do not contest that they tortiously interfered with one or more contracts belonging to Plaintiff PHCI. Judgment by consent is therefore entered in favor of Plaintiff PHCI and against each of the Monahan Defendants and Coast to Coast on Plaintiff's Count Six for Tortious Interference with Contract.
8. The Monahan Defendants and Coast to Coast do not contest that they tortiously interfered with a prospective economic advantage belonging to Plaintiff PHCI. Judgment by consent

is therefore entered in favor of Plaintiff PHCI and against each of the Monahan Defendants on Plaintiff's Count Seven for Tortious Interference with Prospective Economic Advantage.

9. The Monahan Defendants do not contest that they committed computer trespass against Plaintiff PHCI. Judgment by consent is therefore entered in favor of Plaintiff and against each of the Monahan Defendants on Plaintiff's Count Eight for Computer Trespass in violation of N.C. Gen. Stat. § 14-458 and Va. Code § § 18.2-152.3, 18.2-152.4 and 18.2-152.12.
10. The Monahan Defendants and Coast to Coast do not contest that they were unjustly enriched at the expense of Plaintiff PHCI. Judgment by consent is therefore entered in favor of Plaintiff and against each of the Monahan Defendants and Coast to Coast on Plaintiff's Count Nine for Unjust Enrichment.
11. PHCI has incurred damages as a result of the Monahans' actions in an amount in excess of \$3,833,734.
12. The Parties consent to liquidate PHCI's damages and enter CONSENT JUDGMENT against Richard P. Monahan, Kristin Monahan, and Coast to Coast, jointly and severally, in the amount of ONE MILLION DOLLARS and no cents (\$1,000,000.00).
13. Defendants Richard P. Monahan and Kristin Monahan hereby agree and stipulate they will not object to a claim, based on this Consent Judgment, being submitted in the Chapter 13 bankruptcy proceeding pending in the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Court") styled *In re: Richard Patrick Monahan and Kristin Powell Monahan, Debtors, Case No. 19-51575-SCS (Chapter 13)*, or object to any motion filed in the proceedings seeking approval or adoption of this Consent Judgment in

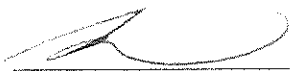
the Bankruptcy Court, or in any other way contest the findings and conclusions set forth in this Consent Judgment.

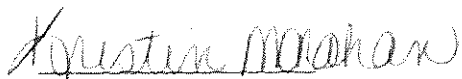
14. Each party shall be responsible for their own costs and attorneys' fees.

This the \_\_\_\_ day of November 2019.

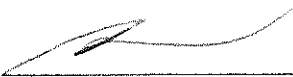
\_\_\_\_\_  
United States District Court Judge

Consented to:

  
\_\_\_\_\_  
Richard Patrick Monahan

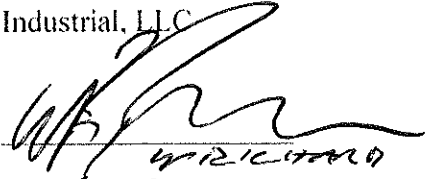
  
\_\_\_\_\_  
Kristin Monahan

Coast to Coast Consulting and Contracting, LLC

By: 

Title: Owner

PHC Industrial, LLC

By:  WILLIAM BURNS  
Title: CEO

WE ASK FOR THIS:

**PHC INDUSTRIAL, LLC**

By: /s/ John S. Buford

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